

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. 3:17-cv-05806-RJB

UGOCHUKWU GOODLUCK
NWAUZOR, individually and on behalf
of all those similarly situated, and
FERNANDO AGUIRRE-URBINA,
individually,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. 3:17-cv-05769-RJB

**EXHIBIT LIST OF JURY
TRIAL**

EXHIBIT LIST - 1

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
Phase 1: C17-5769 and C17-5806 Exhibits with Jury			
321	5/30/14 Detainee Kite requesting to work	10/13/2021	
309	10/22/2015 Pod Porters Roster	10/13/2021	
229	VWP Agreement	10/13/2021	
80	Daily Detainee Worker Pay Sheet – Blank & G-4 Pod Roster for 6/14/17	10/13/2021	
115	12/07/2009 Batch Summary	10/13/2021	
103	Refusal to Work Form	10/13/2021	
69	06/14/2011 Department Head Meeting Minutes	10/13/2021	
17	PBND5 2011 – 5.8 Voluntary Work Program	10/13/2021	
78	5/1/2012 Department Head Meeting Notes	10/13/2021	
14	4/12/2012 Memorandum from Classification to Associate Warden McHatton	10/13/2021	
131	Welcome Book ACA Audit – September 25-27, 2017	10/13/2021	
123	NWDC Detainee Handbook – 8/1/16	10/13/2021	
244	Photograph of laundry with detainee emptying drier	10/13/2021	
329	House Unit Photograph	10/13/2021	
521	Photographs of the detainee living areas	10/13/2021	
522	Photographs of the detainee living areas	10/13/2021	
297	House Unit Photograph	10/13/2021	
430	Kitchen Photograph	10/13/2021	
2	GEO NWDC Policy and Procedure Manual- 5.1.2 Voluntary Work Program. Effective: 4/13/2015.	10/13/2021	

EXHIBIT LIST - 2

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
83	Job Description – Cook/Prep/Server	10/13/2021	
84	Job Description – Dishwasher	10/13/2021	
85	Job Description – Laundry Worker	10/13/2021	
88	Job Description – Barber	10/13/2021	
89	Job Description – Barber Cleaner	10/13/2021	
91	Job Description – Pod Porter	10/13/2021	
141	Post Order: Laundry Officer, Effective Date: 4/5/2016	10/13/2021	
137	GEO NWDC Policy and Procedure Manual 3.3.1: Infractions and Disciplinary Sanctions	10/13/2021	
129	2015 contract between Immigration and Customs Enforcement (ICE) and GEO, No. HSCEDM-15-D-00015 in effect September 28, 2015	10/13/2021	
146	8/24/2011 Memorandum from Heather West to Mike Ruckstuhl	10/13/2021	
364	8/30/2014 Email from Bill McHatton to Lowell Clark	10/13/2021	
20	Chart of Hours Worked and Number of Workers	10/14/2021	
24	Detainee Signed VWP Agreement	10/14/2021	
442	Kitchen Photograph	10/14/2021	
445	Kitchen Photograph	10/14/2021	
433	Kitchen Photograph	10/14/2021	
447	Kitchen Photograph	10/14/2021	
527	Kitchen Photograph	10/14/2021	

EXHIBIT LIST - 3

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
49	Photographs of Detainee Workers in the Kitchen	10/14/2021	
439	Kitchen Photograph	10/14/2021	
434	Kitchen Photograph	10/14/2021	
352	Kitchen Photograph	10/14/2021	
353	Kitchen Photograph	10/14/2021	
438	Kitchen Photograph	10/14/2021	
459	Kitchen Photograph	10/14/2021	
127	Complete Copy of 2011 PBNDs, as revised	10/14/2021	
5	Kitchen Worker Orientation Packet	10/14/2021	
51	5/31/2010 Outcount Sheet Lunch Pay Sheet	10/14/2021	
57	5/9/2013 Daily Detainee Worker Pay Sheets	10/14/2021	
39	5/25/2014 Email from Leonardo Jaramillo to Aaron Rotondo	10/15/2021	
A-303	Nwauzor VWP Documents – VWP Agreement 11/10/16	10/15/2021	
491	Grey Mile Photograph	10/15/2021	
474	Grey Mile Photograph	10/15/2021	
490	Grey Mile Photograph	10/15/2021	
610	Letter from Morgan Jencius to Bruce Scott dated July 6, 2021.	10/18/2021	
A-286	Orlando Marquez-Zavalsa VWP Documents–Signed Voluntary Work Form 04/25/17 (In Spanish)	10/18/2021	
435	Kitchen Photograph	10/18/2021	
607	Detainee Kite #2,193,425 Sent to ICE 9/30/17, Received by ICE and closed 10/3/17.	10/18/2021	
408	Batch Summary 7/24/2017 for work 7/22/2017	10/18/2021	

EXHIBIT LIST - 4

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
407	Batch Summary 5/26/2017 for work 5/25/2017	10/18/2021	
A-336	06/09/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
A-337	06/16/2017 Orlando Marquez-Zavalsa VWP - KITE re Refusal to Work Form	10/18/2021	
A-338	07/16/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
A-339	07/24/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
A-340	08/01/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
A-341	08/03/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
A-342	08/12/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
A-343	10/02/2017 Orlando Marquez-Zavalsa VWP - KITE re Refusal to Work	10/18/2021	
A-344	10/10/2017 Orlando Marquez-Zavalsa VWP - KITE re Voluntary Work Program	10/18/2021	
611	Detainee Kite #2,189,035 Sent to ICE 9/28/2017, Received by ICE and closed 09/29/2017.	10/18/2021	
612	Detainee Kite #2,201,568 Submitted 10/03/2017, Assigned to Cpt. Portillo and closed 10/04/2017.	10/18/2021	
260	9/2/2015 Email from Ryan Kimble to Chuck Hill	10/18/2021	

EXHIBIT LIST - 5

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
175	1/2/2017 Batch Summary	10/18/2021	
534	Payroll Transactions 8/1/2017-9/1/2017	10/18/2021	
180	Invoice to ICE November 2016	10/18/2021	
303	Food Service Department - Food Cost Summary	10/18/2021	
253	Consolidated Financial Statement for 2005 through 2018 for Northwest Detention Center with writing	10/19/2021	
184	8/25/2015 Email from Matt DenAdel to Amber Martin with attached Final GEO Ex. D Tacoma 1101 Bed Guarantee 082575.xls pricing workbook	10/19/2021	
269	GEO NWDC Detainee Work Reimbursement from ICE	10/19/2021	
262	Northwest ICE Processing Center Facility Financial Summaries	10/19/2021	
216	Barbershop Photograph	10/19/2021	
A-296	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents-VWP Agreement 04/23/18	10/19/2021	
A-297	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents-VWP Request to Work 05/02/18	10/19/2021	
A-298	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents-Refusal to Work Form 06/05/18	10/19/2021	
A-300	Karla Gomez-Soto (Maria Nayra Gomez Sotelo) VWP Documents-Detainee Job Description for Laundry Worker 10/04/18	10/19/2021	

EXHIBIT LIST - 6

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
29	PBNDS 2011 Revised 2016 4.1 Food Service	10/19/2021	
27	GEO Corporate Policy and Procedure Manual - 4.3.1: Food Service Management Procedure, Effective 4/18/14	10/19/2021	
300	Internal/External Job Posting – Food Service Supervisor NWDC	10/20/2021	
367	GEO Group Job Description – Job Title: Food Service, Detention Officer. 04/2007	10/20/2021	
585	House Unit Photograph	10/20/2021	
586	House Unit Photograph	10/20/2021	
587	House Unit Photograph	10/20/2021	
A-280	Mural Photo	10/20/2021	
105	Detainees Removed from Kitchen per IDP Sanctions	10/20/2021	
35	2013 NWDC Year End Report	10/21/2021	
36	2014 NWDC Year End Report	10/21/2021	
A-356	Karla Gomez-Soto – Detainee Account History	10/21/2021	
A-302	Resident Account Summary – for Nwauzor - Printed 4/5/21 covering dates: 5/25/16 – 1/24/17	10/21/2021	
A-349	Facility Photo – Housing Unit	10/22/2021	
A-354	Facility Photo – Housing Unit	10/22/2021	
A-350	Facility Photo – Housing Unit	10/22/2021	
A-351	Facility Photo – Housing Unit	10/22/2021	
A-352	Facility Photo – Housing Unit	10/22/2021	
A-347	Facility Photo – Housing Unit	10/22/2021	
A-355	Facility Photo – Outside Recreation	10/22/2021	
A-353	Facility Photo – Recreation – Basketball Court	10/22/2021	
598	House Unit Photograph	10/22/2021	
601	PBNDS 2011 Inspection Sheet	10/25/2021	

EXHIBIT LIST - 7

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
A-357	07/28/2021 Gunster letter re July 6, 2021 FIFRA Notice of Warning, Response of GEO Group, Inc.	10/25/2021	
614	Department of Homeland Security, Office of Inspector General Report: Capping Report: Observations of Unannounced Inspections of ICE Facilities in 2019, dated July 1, 2020	10/25/2021	
Phase 2: C17-5769 Exhibits with Jury			
615	Location codes	10/28/2021	Illustrative only
616	Average shift hours by location	10/28/2021	Illustrative only
617	Expert damages calculations (partial)	10/28/2021	
A-358	Damages Chart	10/28/2021	
618	Back wage calculations	10/28/2021	
Phase 3: C17-5806 Exhibits (Bench trial/without jury)			
22	VWP Program Spend by Month 2006-2016	10/29/2021	
269	GEO NWDC Detainee Work Reimbursement from ICE	10/29/2021	Previously admitted during Phase 1
271	2006 NWDC Year End Report	10/29/2021	
563	Appendix A to Nickerson Second Supplemental Report (CV, firm descriptions, prior testimony)	10/29/2021	
566	Attachment 2 to Nickerson Second Supplemental Report (List of Data Sources for Amounts Paid to Detainees) Cumulative Summary	10/29/2021	

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
567	Attachment 3 to Nickerson Second Supplemental Report (Washington Minimum Wage by Year) Cumulative Summary	10/29/2021	
568	Attachment 4 to Nickerson Second Supplemental Report (Prevailing Wages –occupation, mapping, date, wage, and source) Cumulative Summary	10/29/2021	
569	Attachment 5 to Nickerson Second Supplemental Report (Dep. Exhibit 20 - Annotated with occupational categories and additional details with shift length estimates)	10/29/2021	
571	Attachment 7 to Nickerson Second Supplemental Report (Fair Wage Analysis: January 1, 2013 to September 30, 2019)	10/29/2021	
572	Attachment 8 to Nickerson Second Supplemental Report (Fair Wage Analysis: October 1, 2005 to December 31, 2012)	10/29/2021	
573	Attachment 9 to Nickerson Second Supplemental Report (Fair Wage Analysis: October 1, 2019 to April 10, 2020)	10/29/2021	
574	Attachment 10 to Nickerson Second Supplemental Report (Fair Wage Analysis by Year)	10/29/2021	
575	Attachment 11.1 to Nickerson Second Supplemental Report (WA Minimum Wage Effects)	10/29/2021	
576	Attachment 11.2 to Nickerson Second Supplemental Report (Prevailing Wage Effects)	10/29/2021	

EXHIBIT LIST - 9

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
581	Attachment 13.4 to Nickerson Second Supplemental Report (Actual Revenue and Net Profit for NWDC Compared to Revenue and Net Profits Adjusted for Additional Cost of Minimum Wages and FICA)	10/29/2021	
620	Fair Wage Analysis by Year	10/29/2021	
621	WA Minimum Wage Effects Attachment 11.1	10/29/2021	
622	Prevailing Wage Effects Attachment 11.2	10/29/2021	
A-1	Email thread between Tammy Fellin and other L&I employees	10/29/2021	
A-2	Email thread between Tammy Fellin and Sandy Mullin	10/29/2021	
A-3	Email thread between Tammy Fellin and Sandy Mullin	10/29/2021	
A-4	Email from Fellin to Mullin	10/29/2021	
A-8	Email from Sandy Mullins re: applicability of WMWA to detainees	10/29/2021	
A-106	Email from Suchi Sharma to Lynne Buchanan	10/29/2021	
A-107	Email from Lynne Buchanan to Elizabeth Smith, March 11, 2014	10/29/2021	
A-108	Email from Joel Sacks to Tammy Fellin	10/29/2021	
A-109	Email from Lynne Buchanan to David Johnson	10/29/2021	
A-110	Email from Tammy Fellin to Sandy Mullin (4.14.2014)	10/29/2021	
A-115	Email from Suchi Sharma to Suchi Sharma	10/29/2021	
A-117	Email from Suchi Sharma to Tammy Fellin	10/29/2021	
A-118	Email from David Johnson to Melissa Grondahl (5.4.2016)	10/29/2021	

EXHIBIT LIST - 10

NO.	DESCRIPTION	DATE ADMITTED	COMMENTS
A-305	2017 Sep 18 Email from Tammy Fellin – ACP – NWDC Memo REDACTED	10/29/2021	
A-322	Email between Tammi Fellin and Victoria Kennedy from March 2014	10/29/2021	
A-323	Email from Matthew Erlich to Mores re: L&I authority over detainees	10/29/2021	
A-326	Email from Fellin to Suchi Sharma	10/29/2021	
A-332	Email from David Johnson to Joshua Grice December 2018	10/29/2021	
A-333	Email from David Johnson to Sergio Flores	10/29/2021	
A-334	Email from David Johnson to Elizabeth Smith August 2018	10/29/2021	
A-304	ESDWAGOV- Citizenship and legal rights	11/2/2021	
A-309	2014-04 Ch. 4 DOL Employment Standards Operations Manual	11/2/2021	
A-310	2014-05 Ch. 12 DOL Employment Standards Operations Manual	11/2/2021	